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**JUSTICE COURT
LAS VEGAS NEVADA
BY DEPUTY
KR**

8 **IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP**
9 **CLARK COUNTY, STATE OF NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 v.

13 BIQUI DIANA PARRA RODRIGUEZ,
aka Mary Lou Aguirre,

14 Defendant.
15

Case No.: 14F09685X

Dept. No.: 2

16 **CRIMINAL COMPLAINT**

17 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of
18 Nevada, by and through Deputy Attorney General ADAM L. WOODRUM, complains and
19 charges the above named defendant, BIQUI DIANA PARRA RODRIGUEZ, with having
20 committed the following offenses within the County of Clark, State of Nevada, contrary to the
21 form, force and effect of the statutes made and provided, and against the peace and dignity of
22 the State of Nevada: VIOLATION OF LAWS GOVERNING VOTER REGISTRATION (Two
23 Counts -- NRS 293.800), BURGLARY (Two Counts -- NRS 205.060), OBTAINING AND
24 USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER PERSON TO HARM OR
25 IMPERSONATE PERSON, TO OBTAIN CERTAIN NONPUBLIC RECORDS OR FOR
26 OTHER UNLAWFUL PURPOSE (One Count -- NRS 205.463), POSSESSION OF
27 DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE
28 STATUS OR IDENTITY (One Count -- NRS 205.465), FRAUD IN CONNECTION WITH

1 APPLICATION FOR LICENSE OR IDENTIFICATION CARD (Two Counts -- NRS 483.530),
2 all committed within the County of Clark, State of Nevada, as follows:

3 **COUNT ONE**

4 **BURGLARY**

5 **(Category "B" Felony – NRS 205.060)**

6 That the defendant, did willfully, and unlawfully, by day or night, enter a building with
7 the intent to commit any felony, to wit: That on or about October 18, 2011, the defendant
8 entered a building of Nevada Department of Motor Vehicles, 2710 E Sahara, Las Vegas, NV,
9 with the intent to commit the felony crime of Fraud In Connection With Application For License
10 Or Identification Card, or another felony therein, as more fully set forth in Counts Two, Three,
11 and/or Four, all with the purpose of fraudulently obtaining a Nevada Identification Card in the
12 name of Mary Lou Aguirre.

13 **COUNT TWO**

14 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF**
15 **ANOTHER PERSON TO HARM OR IMPERSONATE PERSON, TO OBTAIN**
16 **CERTAIN NONPUBLIC RECORDS OR FOR OTHER UNLAWFUL PURPOSE**

17 **(Category "B" Felony – NRS 205.463)**

18 Defendant knowingly obtained personal identifying information of another person, and
19 with the intent to commit an unlawful act used the personal identifying information for any
20 unlawful purpose, including, without limitation, to obtain credit, a good, a service or anything of
21 value in the name of that other person, to wit: That on or about October 18, 2011, in or near
22 the location of the Nevada Department of Motor Vehicles, 2710 E Sahara, Las Vegas, NV,
23 Defendant, having obtained personal identifying information of Mary Lou Aguirre, used the
24 information to impersonate Mary Lou Aguirre, and/or for an unlawful purpose as more fully
25 described in Counts Three, Four, and/or Five herein, all with the purpose of fraudulently
26 obtaining a Nevada Identification Card in the name of Mary Lou Aguirre, and/or fraudulently
27 registering to vote in the name of Mary Lou Aguirre.
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COUNT THREE

**POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING
INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY**

(Category "E" Felony – NRS 205.465)

The Defendant unlawfully possessed, sold or transferred any document or personal identifying information for the purpose of establishing a false status, occupation, membership, license or identity for herself or any other person, to wit: That on or about October 18, 2011, in or near the location of the Nevada Department of Motor Vehicles, 2710 E. Sahara, Las Vegas, NV, the Defendant possessed personal identifying information of Mary Lou Aguirre, with the purpose of fraudulently obtaining a Nevada Identification Card in the name of Mary Lou Aguirre, and/or fraudulently registering to vote in the name of Mary Lou Aguirre.

COUNT FOUR

**FRAUD IN CONNECTION WITH APPLICATION
FOR LICENSE OR IDENTIFICATION CARD**

(Category "E" FELONY – NRS 483.530)

That the defendant, did knowingly, willfully, and unlawfully, use a false or fictitious name in any application for a driver's license or identification card, or knowingly made a false statement or knowingly conceal a material fact, or otherwise commit a fraud in any such application, to wit: That on or about October 18, 2011, in or near the location of the Nevada Department of Motor Vehicles, 2710 E Sahara, Las Vegas, NV, the defendant made false statements and/or falsely represented her name, date of birth, social security number, and/or other personal identifying information, in a written application for a Nevada Identification Card, including but not limited to misrepresenting her true name and other personal identifying information.

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COUNT FIVE

VIOLATION OF LAWS GOVERNING ELECTIONS -- VOTER REGISTRATION

(Category "E" Felony – NRS 293.800(1))

That the defendant did wilfully and unlawfully give a false answer or answers to questions propounded to the person by the registrar or field registrar of voters relating to the information called for by the application to register to vote, or willfully falsified the application in any particular, or violated any of the provisions of the election laws of the State, to wit: That on or about October 18, 2011, in Clark County, NV, the defendant completed and/or filed voter registration application #FG07113, falsely representing her name as Mary Lou Aguirre, and/or making other falsifications on said application.

COUNT SIX

**FRAUD IN CONNECTION WITH APPLICATION
FOR LICENSE OR IDENTIFICATION CARD**

(Category "E" FELONY – NRS 483.530)

That the defendant, did knowingly, willfully, and unlawfully, use a false or fictitious name in any application for a driver's license or identification card, or knowingly made a false statement or knowingly conceal a material fact, or otherwise commit a fraud in any such application, to wit: That on or about May April 25, 2014, in or near the location of the Nevada Department of Motor Vehicles, 8250 W. Flamingo Rd Las Vegas, NV, the defendant made false statements and/or falsely represented her name, date of birth, social security number, and/or other personal identifying information, in a written application for a Nevada Drivers Authorization Card, including but not limited to representing that she had never had a driver's license or identification card in another name, when in fact she had at that time held a Nevada Identification Card in the name of Mary Lou Aguirre.

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COUNT SEVEN

VIOLATION OF LAWS GOVERNING ELECTIONS -- VOTER REGISTRATION

(Category "E" Felony – NRS 293.800(1))

That the defendant did wilfully and unlawfully give a false answer or answers to questions propounded to the person by the registrar or field registrar of voters relating to the information called for by the application to register to vote, or willfully falsified the application in any particular, or who violated any of the provisions of the election laws of the State, to wit: That on or about August 16, 2012, in Clark County, NV, the defendant completed and/or filed voter registration application #EN92805, falsely representing her name as Mary Lou Aguirre, and/or making other falsifications on said application.

Complainant knows said crimes occurred and that the defendant BIQUI DIANA PARRA RODRIGUEZ committed the same based upon the following: because the complainant is a Deputy Attorney General, and is in possession of an Affidavit made by Chester F. Clagett, known to the complainant to be an investigator for the State of Nevada, Department of Motor Vehicles, Compliance Enforcement Division. A copy of said affidavit is attached to the complaint and is hereby incorporated by reference herein for the limited purpose of securing a warrant for the arrest of the defendant. Furthermore, the complainant is in possession of an Investigative Report made by Scott Balder, known to the complainant to be an investigator for the State of Nevada Secretary of State, Securities Enforcement Division. A copy of said Investigative Report is attached to the complaint and is hereby incorporated by reference herein for the limited purpose of securing a warrant for the arrest of the defendant. Complainant makes this declaration subject to the penalty of perjury.

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1 All of which is contrary to the form, force and effect of statutes in such cases made and
2 provided against the peace and dignity of the State of Nevada.

3 DATED this 28 day of June, 2014.

4 CATHERINE CORTEZ MASTO
5 Attorney General

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7 By: 

8 ADAM L. WOODRUM
9 Deputy Attorney General
10 Special Prosecutions Division
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EXHIBIT 1

STATE OF NEVADA
DEPARTMENT OF MOTOR VEHICLES
COMPLIANCE ENFORCEMENT DIVISION

AFFIDAVIT
(N.R.S. 171.106)

Case: **14 SI 81554**

STATE OF NEVADA)
) ss. **RODRIGUEZ PARRA, Biqui Diana**
COUNTY OF CLARK)

I, Chester F. Clagett, being first duly sworn, deposes and says:

That he is an Investigator with the Department of Motor Vehicles, Compliance Enforcement Division, being so employed for a period of fifteen years, assigned to investigate the crime of NRS 205.465 (1) Possess or sale of documents or personal identifying information to establish false status or identity, NRS 205.060 Burglary, NRS 483.530 Unlawful uses of a license, NRS 205.110 Uttering forged instruments: Forgery and NRS 293.775(2) Voting by person who knows he or she is not qualified elector; voting using the name of another committed on or about 10-18-2011, which investigation has developed **Bigui Diana RODRIGUEZ PARRA** as the perpetrator thereof.

On 10-18-2011 the suspect, Biqui Rodriguez Parra entered the Sahara Office, Nevada Department of Motor Vehicles (DMV) located at 2710 East Sahara Ave., Las Vegas, Nevada 89104. The suspect completed and fraudulently signed DMV Application for renewal of Nevada Identification card # 2103115459 under the name Mary Lou Aguirre. DMV Application records confirm that the suspect presented as identity previously issued Nevada Identification card # 2103115459 under the name Mary Lou Aguirre. DMV Application records also confirm that the suspect registered to vote under the fraudulent identity while present at Sahara DMV. The suspect was processed and signed DMV Customer Confirmation Copy # 2103115459 certifying under penalty of perjury that all statements in the application are true and correct. The suspect was photographed and issued Nevada Identification card # 2103115459 under the fraudulent name Mary Lou Aguirre. Supervisory Investigator Marisa Hinton, assigned to DMV Compliance Enforcement Division (CED), Custodian of Records is listed as a Witness to validate Attachments "A" through "E".

On 4-25-2014 the suspect, Biqui Diana Rodriguez Parra entered the Flamingo Office, Nevada DMV and submitted DMV Application for Driver Authorization Card (DAC). The suspect indicated NO on the application question asking if she had ever had a driver's license or identification card under another name. DMV Application records confirm that the suspect presented as identity documentation Mexico Consular Card,

Mexico Birth Certificate and residency documents to confirm her identity. The suspect was processed and signed DMV Customer Confirmation Copy # 1604884342 certifying under penalty of perjury that all statements in the application are true and correct. The suspect was photographed for pending issuance via U.S. Mail of DAC 1604884342.

On 4-28-2014 Bio Metric Facial Recognition investigation confirmed that DAC 1604884342 under Biqui Rodriguez Parra issued on 4-25-2014 is a match for Nevada Identification card # 2103115459 issued on 10-18-2011 under Mary Lou Aguirre.

On 4-30-14 this Reporting Investigator (R/I), assigned to DMV/CED was assigned this investigation. A review of investigative resources indicated that the true Mary Lou Aguirre was issued Texas driver's license # 17761859.

On 5-6-14 this R/I requested from Texas Department of Public Safety (DPS), Texas Joint Crime Information Center a copy of Texas driver's license photograph # 17761859 issued to Mary Lou Aguirre.

On 5-6-14 Research Specialist II Erika Fisher, Texas DPS forwarded Texas driver's license photograph # 17761859 identified as Mary Lou Aguirre. The Texas document expired in 2011 and has not been renewed. This R/I confirmed that the Texas photograph does not match Nevada Digimarc's 16044884342 (Rodriguez Parra) and 2103115459 (Aguirre).

Wherefore, affiant prays that an **Arrest Warrant** be issued for suspect **Biqui Diana Rodriquez Parra** on charge of NRS 205.465 (1) (Felony) Possess or sale of documents or personal identifying information to establish false status or identity, NRS 205.060 (Felony) Burglary, NRS 483.530 (Felony) Unlawful uses of a license, NRS 205.110 (Felony) Uttering forged instruments; Forgery and NRS 293.775 (Felony) Voting by person who knows he or she is not qualifies elector, voting using name of another.

AFFIANT

Subscribed and sworn to before me this 9th day of May 2014.

Elizabeth Draser
Notary Public in and for said State and County

State of Nevada/County of Clark

